

# EXHIBIT B

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

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IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

- - -

In Re: : Case No. 3:23-md-  
: 03084-CRB (LJC)  
:  
UBER TECHNOLOGIES, :  
INC., PASSENGER SEXUAL :  
ASSAULT LITIGATION :

- - -

FRIDAY, OCTOBER 24, 2025

- - -

Remote Zoom Videotape Deposition of  
VERONIQUE VALLIERE, Psy.D., taken pursuant to  
Notice, in Allentown, Pennsylvania, commencing  
at approximately 9:15 a.m., on the above date,  
before Rose A. Tamburri, RPR, CM, CCR, CRR,  
USCRA Speed and Accuracy Champion and Notary  
Public.

- - -

Job No. CS7675941

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1 THE WITNESS: It -- it depends.

2 BY MR. LOVE:

3 Q. Now, we've talked about this before,  
4 but I just -- I want to make sure that we have  
5 a clear answer.

6 Do you believe that there is no  
7 environment that is 100 percent free of the  
8 risk of sexual assault?

9 MS. LUHANA: Objection to form.  
10 Objection to the hypothetical.

11 THE WITNESS: In the extreme  
12 situation, I do not believe that if an  
13 offender is determined to offend, that they  
14 will offend.

15 But it is not true that every  
16 environment is at risk or can be a high risk.  
17 It's never a zero risk, but it's -- there are  
18 environments that are much higher risk and  
19 there's many things we can do that will deter  
20 offenders.

21 BY MR. LOVE:

22 Q. Just to make sure I understand, I  
23 understand that there are higher risks and  
24 lower risks, but you said there is never zero  
25 risk.